

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

WILFREDO LOPEZ,

Plaintiffs,

v.

Civil Action No.: 1:13-cv-04759-RJD-SMG

**ALLIED AVIATION SERVICE
COMPANY OF NEW YORK, INC.,
ALLIED AVIATION HOLDINGS
CORPORATION, and
ROBERT L. ROSE, Individually,**

Defendants.

**DEFENDANTS' THIRD UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING TO PLAINTIFF'S COLLECTIVE ACTION COMPLAINT**

Defendants, ALLIED AVIATION SERVICE COMPANY OF NEW YORK, INC., ALLIED AVIATION HOLDINGS CORPORATION, and ROBERT L. ROSE, Individually, by and through their undersigned counsel and pursuant to Rule 7.1 of the Rules of the United States District Court for the Eastern District of New York, and submits this Third Unopposed Motion for Extension of Time to File a Responsive Pleading to Plaintiff's Collective Action Complaint, and as grounds therefore states:

1. On September 3, 2013, Defendants were served with the Collective Action Complaint (D.1) in the above-captioned action.
2. On September 25, 2013, Defendants filed their Unopposed Motion for Extension of Time to File a Responsive Pleading to Plaintiff's Collective Action Complaint (D.5).

3. On September 25, 2013, the Court entered an Order granting Defendants' Unopposed Motion for Extension of Time to File a Responsive Pleading to Plaintiff's Collective Action Complaint.
4. On October 8, 2013, Defendants filed their Second Unopposed Motion for Extension of Time to File a Responsive Pleading to Plaintiff's Collective Action Complaint (D.9).
5. On October 8, 2013, the Court entered an Order granting Defendants' Second Unopposed Motion for Extension of Time to File a Responsive Pleading to Plaintiff's Collective Action Complaint.
6. Defendants are requesting a further 14 day extension of time to file a responsive pleading.
7. The reason for this third request for an extension of time is because the attorneys for the Plaintiff and the Defendants have had numerous communications concerning potential settlement, tolling, consolidation, and the filing of an amended complaint(s), as well as other procedural issues which would be economically beneficial for the parties and which would avoid needless judicial intervention.
8. The undersigned counsel has conferred with Plaintiff's counsel, who are in agreement with Defendants' request for a 14 day extension of time to file a responsive pleading.
9. Consequently, Defendants requests an extension of time until November 6, 2013 to file a responsive pleading to Plaintiffs' Collective Action Complaint.

DATED this 23rd day of October, 2013.

Respectfully submitted,

/s/ Donna M. Griffin

Donna M. Griffin, Esq.

Florida Bar No.: 886335

Donna@SuarezGriffin.com

Eduardo A. Suarez-Solar, Esq.

Florida Bar No.: 958875

Ed@SuarezGriff.com

SUAREZ GRIFFIN, PL

14115 Stilton Street

Tampa, FL 33626

Telephone (813) 433-9003

Fax (813) 287-5757

TRIAL COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2013, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which electronically notifies all counsel of record on the attached service list of such filing.

/s/ Donna M. Griffin

Donna M. Griffin, Esq.

SERVICE LIST

Andrew I. Glenn, Esq.

Jodi J. Jaffe, Esq.

Jodi Glenn Law Group, P.A.

12000 Biscayne Boulevard, Suite 305

North Miami FL 33181

Gregg I. Shavitz, Esq.

Keith M. Stern, Esq.

Shavitz Law Group, P.A.

1515 S. Federal Highway, Suite 404

Boca Raton FL 33432

Attorneys for Plaintiffs